

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, :

v. : 08-CR-322-S

JOSEPH ANDERSON, :

Defendant. :

NOTICE OF MOTION AND MOTION FOR DOWNWARD DEPARTURE
PURSUANT TO SECTION 5K1.1

PLEASE TAKE NOTICE, that upon the affidavit, filed under seal, the United States of America, by William J. Hochul, Jr., United States Attorney for the Western District of New York, and Paul J. Campana, Assistant United States Attorney, of counsel, hereby moves this Court at 68 Court Street, Part IV, Buffalo, New York, on February 3, 2011, at 9:00 a.m. for a downward departure of eleven (11) offense levels pursuant to Section 5K1.1 of the Sentencing Guidelines.

DATED: Buffalo, New York, January 13, 2011.

WILLIAM J. HOCHUL, JR.
United States Attorney

BY: *s/Paul J. Campana*
PAUL J. CAMPANA
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CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2011, I electronically filed the **NOTICE OF MOTION AND MOTION FOR DOWNWARD DEPARTURE PURSUANT TO SECTION 5K1.1** with the Clerk of the District Court using its CM/ECF system, which would then electronically notify the following CM/ECF participants on this case:

Terrence M. Connors, Esq.

United States Probation Department
Attn: Michael J. Quarantillo, USPO

s/Laura Rogers
LAURA ROGERS
Legal Assistant